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Arizona Corporation Commission

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2005 JAN 18 P 4: 15

AZ CORP COMMISSION
DOCUMENT CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE
APPLICATION OF PINE WATER
COMPANY FOR A
DETERMINATION OF THE
CURRENT FAIR VALUE OF ITS
UTILITY PLANT AND PROPERTY
AND FOR INCREASES IN ITS
RATES AND CHARGES BASED
THEREON FOR UTILITY SERVICE
AND FOR APPROVAL TO INCUR
LONG-TERM DEBT

DOCKET NO: W-03512A-03-0279

NOTICE OF FILING DIRECT
TESTIMONY OF ROBERT T.
HARDCASTLE CONCERNING METER
MORATORIUM AND COMPLIANCE
ISSUES

Applicant, Pine Water Company, Inc., hereby files the Direct Testimony Of Robert
T. Hardcastle Concerning Meter Moratorium And Compliance Issues, in the above-
captioned docket.

RESPECTFULLY SUBMITTED this 18th day of January, 2005.

FENNEMORE CRAIG

By

Jay L. Shapiro
Patrick J. Black
3003 North Central Avenue
Suite 2600
Phoenix, Arizona 85012
Attorneys for Pine Water Company

1 Original and 13 copies were filed
2 this 18th day of January, 2005, to:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington
6 Phoenix, Arizona 85007

7 A copy of the foregoing
8 was hand-delivered this
9 18th day of January, 2005, to:

10 Lisa Vandenberg, Staff Attorney
11 Legal Division
12 Arizona Corporation Commission
13 1200 W. Washington St.
14 Phoenix, AZ 85007

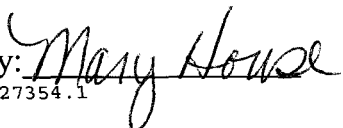
15 Marlin Scott
16 Engineering Division
17 Arizona Corporation Commission
18 1200 W. Washington St.
19 Phoenix, AZ 85007

20 A copy of the foregoing was mailed
21 this 18th day of January, 2005, to:

22 John O. Breninger
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24 3475 Whispering Pines Road
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26 John G. Gliege, Esq.
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Water Improvement District

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By: 
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5
6 **BEFORE THE ARIZONA CORPORATION COMMISSION**

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8 IN THE MATTER OF THE
APPLICATION OF PINE WATER
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19 **DIRECT TESTIMONY OF ROBERT T. HARDCASTLE**
20 **CONCERNING METER MORATORIUM AND COMPLIANCE ISSUES**
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1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND TELEPHONE**
3 **NUMBER.**

4 A. Robert T. Hardcastle, 3101 State Rd., Bakersfield, California 93308. My telephone
5 number is (661) 633-7526.

6 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

7 A. I am the President of Brooke Utilities, Inc. ("Brooke"). Brooke is the sole
8 shareholder of the Applicant, Pine Water Company, Inc. ("PWCo" or the
9 "Company"). I am also the Company's President.

10 **Q. ARE YOU THE SAME ROBERT T. HARDCASTLE THAT PREVIOUSLY**
11 **TESTIFIED IN THIS DOCKET?**

12 A. Yes, my direct, rebuttal and rejoinder testimonies were admitted into evidence in
13 the rate setting portion of this proceeding along with my live testimony during the
14 hearings.

15 **Q. HAVE YOU REVIEWED THE COMPLIANCE STAFF REPORT DATED**
16 **NOVEMBER 19, 2004 IN THIS DOCKET?**

17 A. Yes.

18 **Q. IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING AT**
19 **THIS TIME TO RESPOND TO THAT COMPLAINEE STAFF REPORT ?**

20 A. Yes. More specifically, I will address two aspects of that report. First, I will
21 address Staff's analysis and recommendations concerning a total moratorium on
22 new customer connections in the PWCo service territory. Next, I will address the
23 ADEQ compliance issues raised in Staff's November 19 Compliance Staff Report
24 (the "Report").

25 **Q. WOULD YOU PLEASE SUMMARIZE THE COMPANY'S POSITION ON**
26 **THESE TWO ISSUES?**

1 A. Yes. Regarding the recommended moratorium, I submit that adoption of Staff's
2 recommendation will exacerbate rather than improve the difficulties we face
3 managing limited water supplies in the area the Company serves. This follows
4 from the fact that, to the extent there is a demand for residential and/or commercial
5 growth in the area, if PWCo does not serve those customers someone else will
6 using the same water supplies we utilize to serve our existing customers.
7 Consequently, I believe it is better for the Commission and Company to work
8 together to manage growth in the PWCo CC&N rather than ceding control to Gila
9 County and the local real estate and development community, or worse, creating an
10 incentive for those entities to grow the community outside the current regulatory
11 structure, while utilizing the same water supply relied upon by PWCo and its
12 customers.

13 Regarding the compliance matters, PWCo began working immediately with
14 ADEQ to address the concerns raised and close the compliance files. I wish to
15 note, however, that because the concerns raised by ADEQ are primarily historic
16 deficiencies, we are confident that we have been, are now and will continue to
17 deliver water that meets all applicable water quality requirements.

18 **II. MORATORIUM ON NEW METERS**

19 **Q. HAS THE COMMISSION PREVIOUSLY ADDRESSED THE ISSUE OF A**
20 **MORATORIUM ON NEW METER CONNECTIONS IN THE PWCo**
21 **SYSTEM?**

22 A. Yes, on numerous occasions and I cannot describe the entire history of moratoria in
23 and around Pine, Arizona in this testimony because to do so would unduly lengthen
24 this filing. By way of summary though, to the best of our knowledge the
25 Commission first imposed various moratoria on new service connections and main
26 extensions in the area served by PWCo's predecessors E&R Water Company, Inc.

1 and Williamson Water Works, Inc. in 1989 due to "historical water shortages in
2 and around the Pine, Arizona area." See Decision 64400 (Jan. 31, 2002), *citing*
3 Decision Nos. 56539 (July 12, 1989) and 56654 (Oct. 6, 1989).

4 **Q. HOW LONG HAVE THESE VARIOUS MORATORIA BEEN IN EFFECT?**

5 A. The Commission has kept the moratoria in effect in one form or another through
6 the present. For example, in Decision No. 59753 (July 18, 1996), E&R was limited
7 to one residential connection per month with a complete moratoria on new main
8 extensions. See Decision No. 64400 at 1. Then, in Decision 64400 the
9 Commission modified the moratoria on new connections and main extension
10 agreements for the portion of the PWCo CC&N previously certificated to E&R.
11 Specifically, with respect to new connections, the Commission modified the
12 moratorium to allow the Company to add up to 25 new service connections per
13 month based on the joint recommendation of Staff and the Company. Additionally,
14 with respect to main extension agreements, the Commission allowed the Company
15 to enter into main extension agreements if the developer could contribute a certain
16 minimum quantity of water to PWCo. Then, in Decision No. 65435 (December 9,
17 2002), the Commission extended these moratoria to the entirety of the PWCo
18 CC&N.

19 **Q. WHAT WAS THE BASIS FOR THE COMMISSION'S DECISION TO**
20 **MODIFY THE MORATORIA IN DECISION 64400?**

21 A. I believe it was twofold. First, as Decision No. 64400 reflects, since acquiring the
22 system we have taken a number of steps to improve water delivery and to enhance
23 the available supply of water to the Company's customers. Second, from our
24 perspective, we faced repeated and concerted efforts by local developers and Gila
25 County to circumvent our CC&N and the Commission imposed moratoria.

26 **Q. CAN YOU EXPLAIN WHAT YOU MEAN?**

1 A. Yes, it is no secret to the Commission that for some time now Gila County has
2 desired to and taken steps towards expanding the population in this portion of the
3 County despite the water supply deficiencies. Whether the local real estate
4 community that supports this effort is the reason for the County's desire to expand
5 the population or whether the County, desirous of increasing its tax base has
6 expressed a desire that has spawned the local real estate community, I really cannot
7 say. Either way, the result was that the Company was facing direct pressure from
8 the County and the real estate community to expand its service and increase
9 customer connections as well as indirect pressure through the formation of County
10 improvement districts which became competitors for a limited water supply. Thus,
11 we petitioned and Staff supported the modified moratoria approved in Decision No.
12 64400. To the credit of the Commission and Staff, a far-sighted decision was
13 issued in which the Commission weighed the various alternatives and recognized
14 that the lesser evil was to approve a moratorium that enhanced the agency's control
15 over the local water supply and, at the same time, applied water conservation
16 measures in an area where Gila County had failed to balance growth and resource
17 use for many years.

18 **Q. CAN YOU PROVIDE SPECIFIC EXAMPLES OF SUCH INDIRECT**
19 **PRESSURE MR. HARDCASTLE?**

20 A. Yes. Again, the Commission should recall the lengthy dispute between PWCo and
21 the Strawberry Hollow Domestic Water Improvement District. That District was
22 formed by a developer wishing to construct a 70 plus lot subdivision in PWCo's
23 CC&N. Unable to obtain an extension of service from PWCo to his residential
24 subdivision, the developer successfully petitioned Gila County to create the
25 improvement district with boundaries inside our certificated service area.

26 **Q. WHAT WAS THE COMPANY'S RESPONSE TO THE FORMATION OF**

1 **THE DISTRICT?**

2 A. PWCo brought suit against Gila County challenging the County's right to form a
3 water improvement district without consideration of the availability of water
4 supplies or the impact of such formation on the existing community and its water
5 provider. Unfortunately, after incurring more than \$100,000 in litigation fees and
6 costs, the Court disagreed and essentially concluded that the County's discretion is
7 so broad that it need not consider anything other than whether the requisite number
8 of signatures from property owners is contained in the request to form an
9 improvement district.

10 **Q. WHY WOULD PWCO SPEND THAT KIND OF MONEY TO**
11 **CHALLENGE THE FORMATION OF AN IMPROVEMENT DISTRICT BY**
12 **GILA COUNTY?**

13 A. Because the creation of competitive water providers in our service area threatens
14 our ability to serve our customers and the Commission's ability to help regulate the
15 use of the area's limited water supplies. Let me explain it this way, the
16 groundwater supplies available in PWCo's CC&N are limited and in the end it
17 does not matter whether the water supplies are being pumped by PWCo's wells or
18 somebody else's wells; the water supply is still being used. Thus, when the
19 Commission precluded us from hooking up new customers, it inadvertently created
20 an incentive for Gila County and the real estate community to create alternative
21 water providers. Unfortunately, those providers then utilized water supplies that
22 would otherwise be available to PWCo to serve its customers. Obviously, a
23 number of separate water providers working independently poses a greater threat
24 to the region's limited water supplies than one provider serving all of the customers
25 in the area and well aware of the needs to manage limited water supplies on a
26 regional basis.

1 **Q. DID STAFF ADDRESS THESE CONCERNS IN THE REPORT?**

2 A. No, and that is one of the things that concerns me regarding Staff's analysis. Put
3 bluntly, if we could consider the situation in a vacuum the Company would likely
4 agree with Staff that there are inadequate water supplies available to PWCo to
5 allow for additional customers to be connected to the system. But, Staff ignores
6 the fact that it does not matter whether the Company or some other provider serves
7 those new customers. In the end, the affect is the same as we have only a limited
8 supply of water and I can not help but think that the Company and the
9 Commission, as its regulator, would be better off managing the overall use of the
10 limited supply, including using such supply to serve new customers, than by having
11 the County engage in regional water management and continue to form
12 independent providers serving small areas according to their own needs.

13 **Q. DO YOU HAVE ANY OTHER CONCERNS WITH THE REPORT?**

14 A. Yes, my other concern involves Staff's assessment of the Company's available
15 water supply. It does not appear that Staff has offered a complete enough
16 assessment of the Company's water supply to justify its recommendation that the
17 Commission reimpose a complete moratorium on new service connections.

18 **Q. WOULD YOU PLEASE EXPLAIN WHAT YOU MEAN?**

19 A. Certainly. In the Report, Staff concludes that PWCo's well production could
20 adequately serve up to 555 service connections during peak periods but notes that
21 PWCO has 1,992 active accounts. Staff is fully aware that we supplement our
22 water supply from various sources, most notably Project Magnolia, which brings
23 water from our neighboring Strawberry Water Company system into PWCo's
24 service area. Yet, the Report provides only a brief mention of this critical water
25 supply. In addition, we have made arrangements to purchase water that can be
26 hauled into the system as needed. The totality of available water sources available

1 to the Company to meet the needs of its customers has been the subject of
2 numerous Commission proceedings and decisions, including the decisions I
3 referenced above, and I believe any assessment of PWCo and its available water
4 supply and certainly any recommendations made to the Commission must take into
5 account not only PWCo's in-service territory production capacity but these
6 additional sources. In short, the Commission should take into account evidence of
7 the excellent job PWCo has done over the past 9 years to manage a very limited
8 water supply under the most adverse circumstances imaginable.

9 **Q. DOES THAT MEAN THE COMPANY OPPOSES STAFF'S**
10 **RECOMMENDATION THAT NO NEW METER CONNECTIONS BE**
11 **ALLOWED?**

12 A. Unfortunately, yes. While we are in complete agreement with Staff that we face
13 serious water supply limitations in the Pine area, we are very concerned that
14 precluding the Company from adding a reasonable number of new connections will
15 create an incentive for Gila County and/or the local real estate and development
16 community, likely still desirous of growing Northern Gila County and increasing
17 the tax base, to continue to find ways to circumvent the Commission moratoria.
18 The consequence of such circumvention is the continued carving up of PWCo's
19 CC&N. I am afraid what will happen is that we will continue to incur substantial
20 amounts to protect our property rights and protect our limited water supplies and
21 ultimately will end up with the same customer being served by another water
22 provider.

23 It should be noted that after years of long term water supply problems, Gila
24 County, despite their complete knowledge of the situation, has never attempted to
25 enact local water conservation measures to limit cultivation of the local water
26 supply through the expansion of development interests in the area. PWCo believes

1 the reasons for this lack of political leadership are self-serving. Meanwhile, we
2 submit that the best solution for all is for the Commission, Staff and the Company
3 to continue to work together to manage the limited water supply in a regional
4 fashion that accounts for all of the customers in the area and all the supplies in the
5 area. That cannot be done if PWCo is the only provider restricted from meeting
6 new customer demand. Indeed, I fear that if the Commission does not take this
7 broader outlook, although it might be the more difficult avenue, proper
8 management and regulation of the region's limited water supplies could be
9 permanently hampered.

10 **III. COMPLIANCE ISSUES**

11 **Q. HOW DOES THE COMPANY ADDRESS THE COMPLIANCE ISSUES**
12 **RAISED IN THE REPORT?**

13 A. There are essentially three compliance areas I will address in this testimony. First,
14 there is the 1994 Consent Order issued to E&R Water Company. Second, there are
15 violation notices relating to two of the wells from which PWCo obtains water for
16 service to its customers. Third, there are a number of alleged plant facility
17 deficiencies raised by ADEQ in its inspection report. I will address each of these
18 in turn.

19 **Q. BEFORE DOING THAT MR. HARDCASTLE, DOESN'T THE STAFF**
20 **REPORT ALSO REFER TO AN NOV FOR STRAWBERRY WATER**
21 **COMPANY?**

22 A. Yes it does and I am not sure why, given that Strawberry Water Company and
23 PWCo are separate entities. In any event, based on Staff's communication with the
24 ADEQ, the Report references an alleged failure to provide the Consumer
25 Confidence Report for Strawberry Water Company. We did not fail to provide this
26 and timely filed it in April 2003. Subsequently, after learning that despite

1 providing these materials to ADEQ the agency believed they were not filed, they
2 were again submitted. Then, when we saw this item referenced in the Report, a
3 third copy of the Consumer Confidence Report for Strawberry Water Company
4 was submitted directly to the ADEQ representative handling this matter for the
5 agency. As a result, ADEQ has now closed this NOV. See Letter dated January
6 12, 2005 attached hereto as Exhibit A.

7 **Q. WOULD YOU PLEASE ADDRESS THE 1994 CONSENT ORDER**
8 **RELATING TO E&R WATER COMPANY?**

9 A. Yes. To begin with, this problem predates our acquisition of the PWCo system and
10 I am concerned that the implication is that the Company has simply ignored this
11 matter. Indeed, despite several inspections of the system by ADEQ since we
12 acquired it, it wasn't raised by ADEQ, we did not see anything regarding it in
13 ADEQ's records when we conducted our due diligence and simply did not know
14 there was an outstanding matter.

15 **Q. NOW THAT YOU ARE AWARE WHAT IS THE COMPANY DOING TO**
16 **ADDRESS THE OUTSTANDING 1994 CONSENT ORDER?**

17 A. Unfortunately, this is a very difficult problem. In order to close the 1994 E&R
18 Consent Order, ADEQ wants engineering drawings for the entire portion of the
19 PWCo system that used to be E&R Water Company. Such drawings do not exist
20 and it would cost the Company at least tens of thousands and more likely in excess
21 of \$100,000 to prepare an as-built set of drawings of that portion of our water
22 system. I simply do not think this would be a prudent investment of the
23 Company's capital, particularly given the ongoing water supply crises we face on a
24 regular basis. Therefore, we will make an effort to resolve this issue with ADEQ
25 but I cannot at this time inform the Commission of how it will be finally resolved.

26 **Q. WOULD YOU PLEASE ADDRESS THE NOTICE OF VIOLATION**

1 **REGARDING THE WEEKS AND BLOOM WELLS RAISED IN THE**
2 **REPORT?**

3 A. Yes. Staff is correct that the Company has been informed of violations for failing
4 to obtain an approval of construction for those wells. We have also been informed
5 of certain facilities deficiencies associated with those two wells.

6 **Q. WHEN WAS THE COMPANY NOTIFIED OF THESE VIOLATIONS?**

7 A. We were first notified of the problem during a November 2004 Field Inspection by
8 ADEQ.

9 **Q. ARE THE BLOOM AND WEEKS WELLS OWNED BY THE COMPANY?**

10 A. The wells themselves are, however the properties where these two wells are located
11 are privately-owned by third-parties. The wells were drilled in 1998 by Brooke
12 under water sharing agreements with the landowners, which agreements specify
13 that the water sources themselves are owned by the water provider. PWCo
14 operates several wells under these arrangements.

15 **Q. WHY DIDN'T BROOKE OBTAIN APPROVALS OF CONSTRUCTION**
16 **FOR THE BLOOM AND WEEKS WELLS?**

17 A. Because at the time the wells were drilled we believed that such approvals were not
18 necessary given that the cost of each well was under \$50,000. In hindsight it
19 appears we were mistaken.

20 **Q. WHAT STEPS ARE BEING TAKEN TO ADDRESS THE NOVS FOR THE**
21 **BLOOM AND WEEKS WELLS?**

22 A. PWCO has already conducted the necessary new source sampling and has received
23 the test results back. The only other items required for the approvals for both wells
24 are the completed engineering drawings. Once these materials are submitted to
25 ADEQ the issues giving rise to the violations will be resolved and approvals of
26 construction should be issued. .

1 **Q. IN THE MEANTIME, HAS THE COMPANY STOPPED PUMPING FROM**
2 **THE BLOOM AND WEEKS WELLS?**

3 A. No and ADEQ has not directed us to do so. Moreover, it would be a burden on
4 PWCo and its customers to shut-down the two wells as they provide approximately
5 22% of the Company's well production.

6 **Q. ARE YOU CONFIDENT THAT THE WATER FROM THE BLOOM AND**
7 **WEEKS WELLS DOES NOT POSE ANY ADVERSE HEALTH RISK TO**
8 **YOUR CUSTOMERS?**

9 A. Yes, based on the water quality testing we have conducted, we are confident that
10 the water from those wells is safe for consumption by PWCo's customers.

11 **Q. WHAT ABOUT THE OTHER DEFICIENCIES NOTED IN THE NOVS**
12 **FOR THE BLOOM AND WEEKS WELLS?**

13 A. These deficiencies are also being addressed as promptly as possible.

14 **Q. THE REPORT ALSO REFERS TO SOME 20 ADDITIONAL PLANT**
15 **FACILITY DEFICIENCIES DISCOVERED BY ADEQ. WOULD YOU**
16 **PLEASE COMMENT ON THOSE DEFICIENCIES?**

17 A. Yes. ADEQ has not found PWCo in violation with respect to any of these items
18 and has set forth no obligation or timeline for repair of these items. Although the
19 agency has not established any "due date", we do expect that these items will be
20 corrected promptly and certainly by the next regularly scheduled field inspection.
21 For example, we are in the process of replacing three concrete wells slabs and are
22 installing fences around wells sites. We will complete these efforts as soon as
23 possible given our other operational needs and capital investment requirements.
24 Meanwhile, as discussed above, we are not aware of any problems with the quality
25 of the water being delivered to our customers as a result of these deficiencies and
26 the Company will take all steps to ensure that such water quality is maintained.

1 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

2 A. Yes.

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4 JSHAPIRO/1626469

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Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stephen A. Owens
Director

FS-05-410
January 12, 2005

CERTIFIED MAIL
Return Receipt Requested
7099-3400-0015-7590-7466

Robert Hardcastle
Brooke Utilities Inc.
P.O. Box 82218
Bakersfield, California 93380

Re: Closure of the November 2, 2004 Notice of Violation for E&R Water Co - Strawberry, Public Water System No. 04-006

Dear Mr. Hardcastle:

The Arizona Department of Environmental Quality (ADEQ) has closed the Notice of Violation (NOV) issued to E&R Water Co - Strawberry on November 2, 2004. By closing the NOV, ADEQ has determined that E&R Water Co - Strawberry is in compliance with the specific violation identified in the November 2, 2004 NOV. This determination is based upon your letter dated December 15, 2004 in which you state, "The 2002 CCR was originally sent on April 23, 2003. We resent a copy of the CCR to Jim Puckett May 14, 2004 in response to a compliance status report."

ADEQ will not proceed with further action at this time. However, if additional information regarding the alleged violations is discovered, or if further violations occur, ADEQ may reconsider its position and take additional action as appropriate and as allowed by law.

This closure only applies to the November 2, 2004 Strawberry water system NOV. The second NOV issued to Brooke Utilities on November 2, 2004 for operating two wells in the Pine water system without an Approval of Construction is still open and valid.

If you need any additional information or help, please feel free to contact me at (800) 234-5677 ext. 771-4841.

Sincerely,

Romann G. Diaz, Manager
Water Quality Field Services Unit

cc: Vivian Burns, ADEQ
Marlin Scott, Arizona Corporation Commission
Mistie Jared, Brooke Utilities Inc., P.O. Box 82218, Bakersfield, CA 93380
Gila County Health Department
WQFSU Facility Files, PWS 04-006
WQFSU Reading File

Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
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400 West Congress Street • Suite 433 • Tucson, AZ 85701
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